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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Cogent Healthcare of Arizona, P.C.; Sound
Physician Intensivists of Arizona, Inc.;
Sound Physicians Emergency Medicine of
Arizona, Inc.; and Hospitalist Medicine
Physicians of Arizona - Nogales Inc.,

Plaintiffs,

v.

Blue Cross and Blue Shield of Arizona,
Inc.,

Defendant.

Case No. 23-cv-02119-DLR

**STIPULATION FOR EXTENSION
OF TIME TO RESPOND TO
COMPLAINT (SECOND REQUEST)**

-AND-

**STIPULATION REGARDING
PROPOSED BRIEFING SCHEDULE
FOR MOTION TO DISMISS**

Defendant Blue Cross and Blue Shield of Arizona and Plaintiffs Cogent Healthcare of Arizona, P.C., Sound Physicians Intensivists of Arizona, Inc., Sound Physicians Emergency Medicine of Arizona, Inc., and Hospitalist Medicine Physicians of Arizona – Nogales, Inc. recently conferred pursuant to LRCiv 12.1 regarding Defendant's intention to file a motion to dismiss Plaintiffs' Complaint (Doc. 1). The parties further conferred regarding potential scheduling conflicts that could impact the briefing of Defendants' forthcoming motion, including their respective workloads, filing deadlines in other cases, and anticipated vacation time during the upcoming holidays. In light of these discussions, and to ensure that each party will have sufficient time to fully and fairly brief their respective positions on a dispositive motion, the parties have stipulated and agreed to the following briefing schedule for Defendant's forthcoming

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1 motion to dismiss:

2	Deadline for Defendants to File Motion to Dismiss	December 5, 2023
3	Deadline for Response to Motion to Dismiss	January 9, 2024
4	Deadline for Reply in Support of Motion to Dismiss	January 22, 2024

5
6 The parties' intent in coordinating and proposing the above briefing schedule is to
7 obviate the need for future stipulations under LRCiv 7.3 relating to the briefing of
8 Defendant's forthcoming motion.

9 A proposed form of order has been lodged with this stipulation.

10 DATED this 20th day of November, 2023.

11 PAPETTI SAMUELS WEISS MCKIRGAN LLP

12 /s/Todd D. Erb

13 Randy Papetti

14 Todd D. Erb

15 Hannah G. Dolski

*Attorneys for Defendant Blue Cross and
Blue Shield of Arizona, Inc.*

16 DAWSON & ROSENTHAL

17 /s/Steven C. Dawson

18 Steven C. Dawson

19 *Attorneys for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of November, 2023, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing, and for transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Matthew M. Lavin (pro hac vice anticipated)
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